

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Sara C. Dillon,)	Case No. 21-70300 JAD
Debtor(s))	Chapter 13
)	Related to Docket No. 33-34
)	
Ronda Winnecur, Chapter 13 Trustee,)	
Movant(s))	Hearing Date and Time:
)	August 17, 2022 at 10:00 A.M.
)	
)	
vs.)	
)	
Sara C. Dillon,)	
Respondent(s))	

**RESPONSE TO MOTION FOR ORDER COMPELLING STATUS REPORT ON
INSURANCE ADJUSTMENT OF LOSS AND TAKE STEPS TO DETERMINE
BALANCE DUE TO LENDER**

AND NOW, comes the Debtor, Sara C. Dillon, by and through her attorney Kenneth Steidl, and Steidl and Steinberg, and respectfully represents as follows:

1. The Debtor's 1999 Ford Mustang ("Vehicle"), subject to the lien of One Main Financial Group LLC ("Lender"), Claim No.3 ("claim") was involved in accident in May 2022 and declared a total loss.
2. The Debtor's insurance company, State Farm, paid the sum of \$5,320.00 for the loss to the Lender on July 7, 2022.
3. The Debtor's counsel contacted the Lender's bankruptcy department on July 21, 2022 to confirm receipt of the insurance payment of \$5,320.00.
4. The Lender advised counsel that the funds were received and the claim is in queue to be amended to reflect the current outstanding balance. The

Lender estimated that an amended claim will be filed within the next two weeks.

5. The Lender's claim will remain secured as the Debtor's 2020 Yamaha YZ is subject to the lien of One Main Financial Group LLC.
6. The Debtor intends to retain the 2020 Yamaha YZ and so the Lender's amended claim will continued to be treated as a secured pay in full claim.

WHEREFORE, the Debtor, Sara C. Dillon, respectfully submits this response to the Trustee's Motion to Compel.

Respectfully submitted,

July 21, 2022
DATE

/s/ Kenneth Steidl
Kenneth Steidl, Esquire
Attorney for the Debtor(s)

STEIDL & STEINBERG
Suite 2830 – Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
(412) 391-8000
ken.steidl @steidl-steinberg.com
PA I.D. No. 34965